

ASKIA WASHINGTON # 69032-066
FEDERAL DETENTION CENTER - BOX 562
PHILADELPHIA, PA. 19105
CRIMINAL DOCKET # 13-171-2(JHS)

APRIL 24, 2015

HON: JOEL H. SLOMSKY, U.S.D.J.
UNITED STATES DISTRICT COURTHOUSE
PHILADELPHIA, PA. 19106

MR. SALVATORE L. ASTOLFI, A.U.S.A.
UNITED STATES ATTORNEY'S OFFICE
PHILADELPHIA, PA. 19107

PRO SE MOTION FOR DISCOVERY

PLEASE ACCEPT THIS LETTER-MOTION IN LIEU OF A MORE FORMAL MOTION SEEKING FURTHER DISCOVERY IN SUPPORT OF MY DEFENSE IN THIS MATTER AND FOR USE AS IMPEACHMENT MATERIAL AT THE TIME OF TRIAL. ON NUMEROUS OCCASIONS I HAVE ASKED MY ASSIGNED COUNSEL TO FILE A CONTINUING DISCOVERY REQUEST FOR THE HEREIN MENTIONED DOCUMENTS AND SUCH HAS NOT BEEN DONE. THEREFORE, I SUBMIT THIS PRO SE PETITION.

I REQUEST THE A.T.F. MANUAL WHICH INCLUDES PROVISIONS RELATED TO THE TRAINING OF AGENTS AND LAW ENFORCEMENT IN HOW TO CONDUCT SUCH STASH HOUSE STINGS AND THE IDENTIFICATION OF TARGETS FOR THIS TYPE OF STING OPERATION ALONG WITH THE CRITERIA FOR INITIATING SUCH STING AND HOW THE INFORMANT AND OFFICERS ARE TRAINED NOT TO ENGAGE IN ENTRAPMENT. THESE PROTOCOLS AND/OR DIRECTIONS TO AGENTS REGARDING HOW TO CONDUCT SUCH OPERATIONS ARE NECESSARY FOR THE PURPOSE OF IMPEACHMENT MATERIAL AT THE TIME OF DIRECT EXAMINATION AND CROSS EXAMINATION OF THE INFORMANT AND LAW ENFORCEMENT AGENTS DURING THE TRIAL. THIS REQUEST SHOULD NOT BURDEN THE GOVERNMENT BECAUSE THE SAME MANUAL HAS BEEN ORDERED TURNED OVER TO DEFENDANTS IN THREE DISTRICT COURT CASES AND THE GOVERNMENT FULLY COMPLIED WITH SUCH DISCOVERY DEMANDS. THEREFORE, THE A.T.F. MANUAL AND DOCUMENTS ARE NOT 'PRIVILEGED', 'EXEMPTED', OR 'PROTECTED'. THE CASE'S IN WHICH SUCH MANUAL AND DOCUMENTS WERE TURNED OVER IN DISCOVERY ARE THE FOLLOWING: U.S. V. ALEXANDER, 2013 U.S. DIST. LEXIS 172975 (7TH. CIR.); U.S. V. PAXTON, 2014 U.S. DIST. LEXIS 56857 (7TH. CIR.); U.S. V. COUSINS, 2014 U.S. DIST. LEXIS 142139 (7TH. CIR.).

POPULATION #'S ARE FROM THE 2010 CENSUS

- (1) PERCENTAGE % VARIATION IS FROM PEOPLE LISTING - "MIXED".
 (2) USING AN AVERAGE OF FIVE ARRESTS PER. OPERATION.
 (3) USING THE LAWS OF RANDOM PROBABILITY.

"STASH HOUSE OPERATIONS"

POPULATION:	USA	CAMDEN COUNTY	CAMDEN CITY
<u>TOTAL POPULATION</u>	308,000,000	513,000	77,000
AFRICAN-AMERICAN	42,020,743	100,035 - 19.5%	39,000 - 51%
WHITE	223,553,265	336,015 - 65.5%	13,000 - 17%
OTHER	50,477,594	76,985 - 15%	25,000 - 32%

*MINORITIES - 92,498,337 - 30% 176,985 - 34.5% 64,000 - 83%

*WHITES TO MINORITIES - 25 TO 1 2 TO 1 1.5

*CRIME - #'S FROM "USA TODAY", JUNE 28TH. - 2013 & AUGUST 2, 2013.

*FROM 2003 TO 2013 - THERE HAS BEEN (250) "DRUG STASH HOUSE OPERATIONS"
 WITH OVER 1,000 ARRESTS NATIONWIDE.

"NATION WIDE""CAMDEN CITY"

*MINORITIES ARRESTED: 1,000 50

*WHITES ARRESTED: 8 0

*PERCENTAGE OF MINORITIES ARRESTED:

99%

100%

*INCREASE IN PROBABILITY OF A SUCCESSFUL ARREST OF A MINORITY TARGET:

*CAMDEN CITY VS. NATIONAL - 270% INCREASE

*THE ODDS OF A 100% MINORITY ARREST RATE IN CAMDEN CITY IS - 9100 TO 1 .

NOTE:

IF YOU WAS TO WALK THE STREETS OF CAMDEN BLINDFOLDED AND GRAB 50 PEOPLE RANDOMLY, THE ODDS OF THEM ALL BEING MINORITIES WOULD BE - 9100 TO 1. YOU WOULD HAVE TO DO IT 9100 TIMES TO GET 50 MINORITIES. MEANING THAT IT WOULD BE WHITES IN THE POOL.

TRULINCS 69032066 - WASHINGTON, ASKIA - Unit: PHL-E-S

FROM: [REDACTED]
TO: 69032066
SUBJECT: UPDATE
DATE: 04/14/2015 02:51:10 PM

On January 8th, 2015 District Court Judge Joseph E. Irenas, from the Southern District of New Jersey (3rd Circuit), sentenced Defendant Terrence Hardee to 8yrs for his role in a Stash-House/Reverse-Sting case. Though still a long time for a "fairy tail" crime (as described by Irenas), Hardee initially faced a Guideline Sentence of 360 months to life, and a Mandatory Minimum sentence of 10yrs on the drug charges alone. But in an unprecedented turn of events, Judge Irenas lowered the drug amount due to "Sentencing Entrapment" (a defense often times rejected in many Circuits) saying: "making the amount of Kilo's the amount the DEA invented is a form of abuse of the process".

He then proceeded to depart further through 3553(a) factors by stating that the "Nature & Circumstances" of the Offense are: "there is no offense, really". "So there was no risk to the public". "This offense was like a practical joke, more than it was a real offense", Irenas said. "I just have trouble putting someone away for life" or "a hugely long sentence for the crime that never was, never could be, and never would be", said Irenas.

The Government has since appealed. But if the sentence upholds, and the 3rd Circuit decides to take advantage of the opportunity to set some real standards, or even do away with stash-house/reverse-stings all together, this case can very well mark the turning point for the thousands of defendants nation wide made victim by these abusive & discriminatory policing tactics. Sign the @REVERSESTING.ORG petition, and advocate #ReverseStingAwareness to help speak out.

Love is Love, get@us!!!
#ReverseSting.Org/Awareness!!!

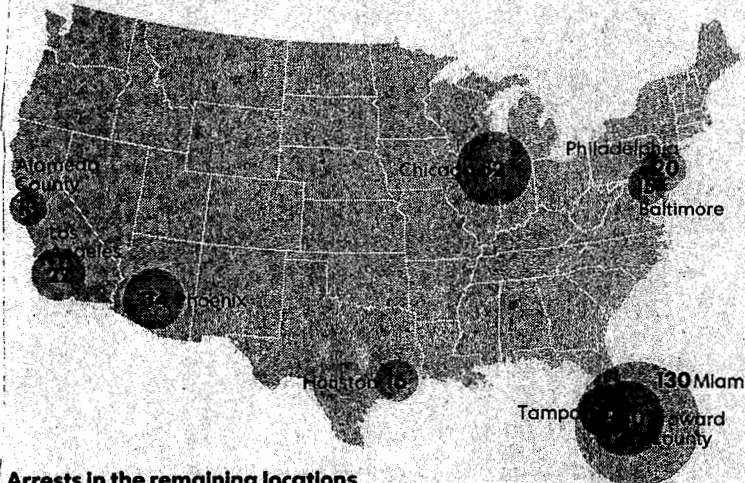
EXHIBIT - "C"

 *DATA MENTIONED IN THIS EXHIBIT ONLY APPLIES TO THE MAP AND CITIES WHICH ARE MENTIONED BELOW - OTHER MINORITY NEIGHBORHOODS AND CITIES HAVE NOT BEEN INCLUDED

STINGS TARGET A FEW SPOTS

USA TODAY identified more than 600 of the suspects in ATF drug-house stings. Most of the operations took place in a handful of major cities, particularly around South Florida.

The top 10 locations for number of arrests



Arrests in the remaining locations

X Detroit	12	X Cleveland	4
Travis County, Texas	12	Collier County, Fla.	4
Tucson	12	X Inglewood, Calif.	4
X Las Vegas	10	Kane County, Ill.	X 4
X San Diego	9	Lake County, Ind.	X 4
X Dayton, Ohio	8	Napa County, Calif.	X 4
X Fairfax County, Va.	8	Polk County, Fla.	X 4
Billings, Mont.	7	Shreveport, La.	X 4
X Fort Worth	7	Webb County, Texas	X 4
Allen County, Ind.	6	DuPage County, Ill.	3
X Dallas	6	Essex County, Mass.	X 3
X Fort Myers, Fla.	6	Lake County, Ill.	3
Polk County, Iowa	6	Menlo Park, Calif.	X 3
X Atlanta	5	Nashville	X 3
Bloomington, Ind.	5	Orange County, Fla.	3
X Camden County, N.J.	5	Richland County, S.C.	X 3
X Memphis	5	Rockford, Ill.	X 3
Naples, Fla.	5	Yakima County, Wash.	3
X New York	5	X Gainesville, Fla.	2
Pinellas County, Fla.	5	Hammond, Ind.	X 2
X Seattle	5	Orange County, Calif.	X 2

Source USA TODAY research

RECEIVED

APR 23 2015

NOTE - ** "FACT" - OUT OF FORTY TWO CITIES STATED ABOVE IN WHICH A.T.F. DRUG STASH HOUSE STINGS WERE CONDUCTED IN, DEFENDANT HAS CONFIRMED TWENTY EIGHT OF THOSE CITIES AS BEING MINORITY NEIGHBORHOODS. THE OTHER FOURTEEN CITIES ARE PENDING VERIFICATION AT THE TIME THIS EXHIBIT WAS COMPILED.